

EXHIBIT 4

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
3

4 * * * * *

5 THE CITY OF HUNTINGTON,

6 Plaintiff,

7 vs.

CIVIL ACTION
NO. 3:17-01362

8 AMERISOURCEBERGEN DRUG
9 CORPORATION, et al.,
10 Defendants.

11 _____
12 CABELL COUNTY COMMISSION,
13 Plaintiff,

14 vs.

CIVIL ACTION
NO. 3:17-01665

15 AMERISOURCEBERGEN DRUG
16 CORPORATION, et al.,
17 Defendants.

18 * * * * *

19 Videotaped and videoconference deposition
20 of DARLA BENTLEY taken by the Defendants under the
21 Federal Rules of Civil Procedure in the above-
22 entitled action, pursuant to notice, before Teresa
23 S. Evans, a Registered Merit Reporter, at the
24 Mountain Health Arena, One Civic Center Plaza,
 Huntington, West Virginia, on the 17th day of July,
 2020.

1 Q. Yes, ma'am.

2 A. I'm gonna say probably 15 years ago or so.

3 Q. And what did you learn about prescription
4 opioids when you first learned about them?

5 A. I didn't learn much. All I know is that I
6 had family members and friends who were prescribed
7 opioids for various medical issues.

8 Q. Do you have an understanding of what
9 prescription opioids were prescribed for for those
10 individuals? In other words, to treat what sort of
11 issue?

12 A. Most likely pain.

13 Q. And do you know whether the prescription
14 opioids that were prescribed to your family and
15 close friends helped with those folks' pain?

16 MS. DEYNEKA: Object to form.

17 A. I can't speak to that.

18 Q. Do you know whether any of the family
19 members or close friends who you testified received
20 prescription opioids became addicted to
21 prescription opioids?

22 A. Yes.

23 MS. DEYNEKA: Object to form.

24 Q. And who, in particular, are you thinking of

1 that became addicted to prescription opioids based
2 on your understanding?

3 A. Well, my brother, for one.

4 Q. And approximately when did your brother
5 become addicted to prescription opioids, ma'am?

6 A. I couldn't answer to that. I'm not sure
7 when, at what point.

8 Q. And do you -- do you know whether your
9 brother used other substances in addition to
10 prescription opioids? And I apologize for the
11 personal nature of the question. Of course, as you
12 know, the case is about prescription opioids, and
13 so it's important to understand how possible
14 witnesses that may be called by either side at
15 trial may have a connection or an understanding of
16 various opioids, so that --

17 I apologize, but that's the
18 significance of the question. So let me restate
19 the question now. Are you aware of whether your
20 brother used other substances aside from
21 prescription opioids?

22 A. Not to my knowledge.

23 Q. And is your brother currently addicted to
24 prescription opioids as you understand it?

1 A. No, my brother passed away when he was 56.

2 Q. I'm very sorry to hear that, Ms. Bentley.

3 And did your brother pass away from something you
4 believe was related to opioids?

5 MS. DEYNEKA: Object to form.

6 And Ms. Bentley, I counsel you to
7 respond to these questions only as much as you feel
8 comfortable discussing this.

9 A. Yes.

10 Q. And Ms. Bentley, when did your brother pass
11 away?

12 A. May of 2017.

13 Q. Now, Ms. Bentley -- and I hope this will be
14 my last question on this topic, so I'm doing my
15 best to keep it short.

16 Do you know whether your brother took
17 the prescription medication as it was prescribed to
18 him?

19 MS. DEYNEKA: Object to form.

20 A. As far as I know, he did. I have no -- I
21 have no -- no -- I can't answer exactly. I mean,
22 as far as I know, he did, yes.

23 Q. Is it fair to say, Ms. Bentley, you're not
24 a medical doctor?

1 A. Yes.

2 Q. And it's fair to say then you're not
3 licensed to practice medicine in West Virginia or
4 anywhere else, right?

5 A. Right.

6 Q. And is it also fair to say you're not a
7 pharmacist?

8 A. Yes.

9 Q. And let me -- you're not licensed to fill
10 prescriptions for a patient, right?

11 A. Correct.

12 Q. And you've never worked for the United
13 States Drug Enforcement Agency or DEA, right?

14 A. Correct.

15 Q. And you've never worked for the West
16 Virginia Board of Pharmacy either, right?

17 A. Correct.

18 Q. And you've never worked for the United
19 States Food and Drug Administration, right?

20 A. Correct.

21 Q. So is it fair to say you're not an expert
22 in determining when it might be appropriate to
23 prescribe opioids to a patient?

24 A. Correct.